

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE: Laurie A. Stopyra
Gary J. Stopyra Sr.**

Debtor(s)

**Freedom Mortgage Corporation, its successors
and/or assigns**

Movant

vs.

Ronda J. Winnecour

Respondent(s)

BK NO. 19-00152 HWV

Chapter 13

Related to Document No. 52

RESPONSE TO DEBTOR'S MOTION TO SELL PROPERTY OF THE ESTATE

Freedom Mortgage Corporation enters its response to the Debtor's Motion to Sell Property of the Estate:

1. Creditor's loan is secured by a mortgage on Debtor's property at 3274 Scotland Road, Chambersburg, PA 17202.

2. Creditor would not object to the sale so long as the Order entered is clear that the sale is not free and clear of secured creditors lien and same shall remain on the property until such time that it is paid in full. The amount currently owed to Freedom Mortgage Corporation thru June 2, 2023 is approximately \$230,463.71. Debtor is required to obtain an updated and proper payoff quote from the Creditor prior to closing.

WHEREFORE, the Movant, Freedom Mortgage Corporation, prays that the Court enters an Order requiring the Secured Creditor to be paid in full.

Respectfully submitted,

Date: May 8, 2023

/s/ Brian C. Nicholas
Brian C. Nicholas, Esquire
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701 Market Street, Suite 5000
Philadelphia, PA 19106
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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE: Laurie A. Stopyra
Gary J. Stopyra Sr.**

Debtor(s)

BK NO. 19-00152 HWV

Chapter 13

**FREEDOM MORTGAGE
CORPORATION**

Movant

vs.

**Laurie A. Stopyra
Gary J. Stopyra Sr.**

Debtor(s)

Jack N. Zaharopoulos,

Trustee

**CERTIFICATE OF SERVICE
RESPONSE TO DEBTOR'S MOTION TO SELL PROPERTY OF THE ESTATE**

I, Brian C. Nicholas of KML Law Group, P.C., certify that I am, and at all times hereinafter mentioned was, more than 18 years of age and that on May 9, 2023, I served the above captioned pleading, filed in the proceeding on the parties at the addresses shown below:

Debtor(s)

Laurie A. Stopyra
3274 Scotland Road
Chambersburg, PA 17202

Gary J. Stopyra Sr.
3274 Scotland Road
Chambersburg, PA 17202

Attorney for Debtor(s) (via ECF)

Stephen Wade Parker
Mooney and Associates
230 York Street
Hanover, PA 17331

Trustee (via ECF)

Jack N. Zaharopoulos
8125 Adams Drive
Hummelstown, PA 17036

Method of Service: electronic means or first-class mail

Dated: May 9, 2023

/s/ Brian C. Nicholas

Brian C. Nicholas Esquire
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